

UNITED STATES DISTRICT COURT

for the
District of New MexicoUnited States of America
v.
Jennifer Lynn Miller (YOB 1980)

Case No. 23-MJ-1453 LF



FILED
United States District Court
Albuquerque, New Mexico
Mitchell R. Elfers
Clerk of Court

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2023 in the county of Bernalillo in the

District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1) and (b)(1)(A):	Possession with intent to distribute 400 grams and more of a mixture and substance containing a detectable amount of Fentanyl
21 U.S.C. § 841(a)(1) and (b)(1)(B):	Possession with intent to distribute 50 grams or more of a mixture and substance containing methamphetamine

This criminal complaint is based on these facts:

Please see the attached affidavit of DEA Special Agent Kyle Coffey, which is incorporated by reference and has been reviewed and approved by AUSA Elaine Ramirez.

☒ Continued on the attached sheet._____
Complainant's signature

Kyle Coffey, DEA Special Agent

Printed name and title

Telephonically sworn and electronically signed.

Date: 09/26/2023City and state: Albuquerque, New Mexico_____
Judge's signature

Laura Fashing, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

IN THE MATTER OF THE ARREST OF:

Jennifer Lynn MILLER (YOB 1980)

Case No. 23-MJ-1453 LF

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (“SA”) with the United States Drug Enforcement Administration (“DEA”) and have been since May 2020. I am assigned to the DEA’s Albuquerque District Office. As a SA for the DEA, I am an investigative law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7) and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. As a SA with DEA, I retain the powers of enforcement as set forth in 21 U.S.C. § 878. Prior to my employment with the DEA, I was employed as a police officer with the Virginia Beach Police Department for approximately four years. Over the course of my career, I have accumulated the following training and experience:

- a. I graduated from the DEA Academy in Quantico, Virginia, where I received approximately 14 weeks of specialized drug-related training. The training included controlled substance identification, drug-related investigative techniques, interview and interrogation training, preparation of search warrants, tactical applications of drug enforcement, and surveillance and electronic monitoring techniques.
- b. As a police officer and a DEA SA, I have participated in investigations of individuals and organizations trafficking heroin, cocaine, cocaine base (“crack”),

marijuana, methamphetamine, fentanyl, and other controlled substances as defined in 21 U.S.C. § 801. My experience as a SA includes, but is not limited to, conducting surveillance; interviewing witnesses; participating in arrests, searches, and seizures; drafting affidavits for search warrants and criminal complaints; and working with informants. I have participated in the investigation of several drug trafficking conspiracies. As a result, I am familiar with matters including, but not limited to, the means and methods used by persons and drug trafficking organizations (DTO) to purchase, transport, store, and distribute illegal drugs and to hide profits generated from those transactions.

2. This case is being investigated by the DEA. I have personally participated in the investigation described below. I make this affidavit based on my participation in the investigation, as well as my review of reports, documents, and/or information made available to me by other agents, task force officers (“TFOs”), and other law enforcement authorities, collectively referred to as “Agents” hereinafter. This Affidavit is intended only to show that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge or the surrounding facts pertaining to this matter.

SUMMARY OF PROBABLE CAUSE

3. This Affidavit is made in support of the issuance of a criminal complaint charging Jennifer Lynn MILLER (“MILLER”) with the following violations:

- a. 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), that being Possession with intent to distribute 400 grams and more of a mixture and substance containing Fentanyl.

- b. 21 U.S.C. § 841(a)(1) and (b)(1)(B): Possession with intent to distribute 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

4. On September 21, 2023, Agents executed a New Mexico State search warrant at room 251 of the Querque Hotel, located at 1760 Menaul Road NE, Albuquerque, New Mexico, located within Bernalillo County. As a result of the search of the room, agents located the following:

- a. Multiple bundles of suspected fentanyl pills, approximately 24.2 gross kilograms in weight. A field test of the suspected fentanyl pills was conducted and indicated presumptive positive for fentanyl.
- b. Suspected methamphetamine, approximately 230.1 gross grams in weight. A field test of the suspected methamphetamine was conducted and indicated presumptive positive for methamphetamine.
- c. Three legal documents with the name of Jennifer Miller indicated.

5. Examination of the legal documents revealed a State of New Mexico Bill of Sale for a vehicle or vessel. On this document, the buyer appears to be Jennifer Miller. In a section for the Buyer's Printed Name appears "Jennifer L. Aragon" however, "Aragon" is one lined and the name "Miller" appears above Aragon. Under a section for a buyer's name and address appears "Jennifer L. Miller" and "101 Riverside Dr. S.W. APT A, Albuquerque, N.M. 87105". New Mexico Driver's license inquiry indicates MILLER's residence of record is 101 Riverside DR SW, Albuquerque, NM, 87105.

6. Agents obtained additional information regarding the rental of room 251 residence at the Querque Hotel. Upon review of the rental information, agents observed

MILLER as the name associated with the reservation. An email address of "jmille.991701@guest.booking.com" was utilized in the booking of the Querque reservation. Querque Hotel documents indicate MILLER checked into room 250 at the Querque Hotel, and later requested a room change to room 251, which was granted by the Querque Hotel. Querque Hotel documents also indicate a credit card belonging to MILLER was utilized to pay for the stay. A signature, which appears to read "Jennifer Miller" appears as the signature related to the Querque Hotel stay. An address of 101 Riverside Dr Sw, Apt. A, Albuquerque, US (New Mexico), 87105, is listed as an address associated with MILLER.


7. A phone number of 505-800-1950 was a number utilized in MILLER's reservation at the Querque Hotel. Subscriber information for the 505-800-1950 phone number indicates the phone number as registered to MILLER.

8. Based upon the aforementioned information, agents believe that MILLER was the owner of the suspected fentanyl and methamphetamine located in the room 251 residence. Based on my training and experience, the bundles of suspected fentanyl were packaged in a manner consistent with distribution of bulk quantities of narcotics and the quantity of suspected methamphetamine is an amount consistent with drug trafficking.

9. Based on my training and experience, I know the amounts of narcotics possessed by MILLER are consistent with drug trafficking and not personal use quantities.

10. I declare under the penalty of perjury that the facts contained herein are true and correct to the best of my knowledge.

11. Assistant United States Attorney Elaine Ramirez reviewed and approved this Affidavit.



Kyle Coffey
Special Agent
Drug Enforcement Administration

Telephonically sworn to me and electronically signed
this 26th day of September, 2023.



THE HONORABLE LAURA FASHING
United States Magistrate Judge